

FILED RECEIVED
ENTERED SERVED ON
JUL 18 2012

2012 JUL 18 A 11:29

U.S. DISTRICT COURT
SAN DIEGO, CALIFORNIA

CLERK OF COURT

COMP
CHIBUEZE C. ANAEME
c/o General Delivery, U.S Post Office-Midway Branch
San Diego, CA 92138
Phone Number: (212)808-0301 (Temporary)
E-mail: nexnns@yahoo.com

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

CHIBUEZE C. ANAEME,

2:12-cv-01278-GMN -CWH

Plaintiff,

vs.

UNITED STATES OF AMERICA,

COMPLAINT FOR DAMAGES

Defendant.

PUBLIC STORAGE, INC., ALL

LOCATIONS, SUBSIDIARIES, DIVISIONS

AND BRANDS.

PUBLIC STORAGE, INC.,

DOUGLASVILLE, GEORGIA.

STATE OF CALIFORNIA.

SAN DIEGO COUNTY, CALIFORNIA.

CITY OF SAN DIEGO, CALIFORNIA.

OFFICE OF COUNTY COUNSEL, SAN
DIEGO COUNTY, CALIFORNIA.

OFFICE OF THE PUBLIC DEFENDER,
SAN DIEGO COUNTY, CALIFORNIA.

OFFICE OF THE CITY ATTORNEY, CITY
OF SAN DIEGO, CALIFORNIA.

1 SAN DIEGO POLICE DEPARTMENT.

2 SAN DIEGO UNIFIED PORT DISTRICT.

3 SAN DIEGO HARBOR POLICE.

4 SAN DIEGO COUNTY SHERIFFS'
5 DEPARTMENT.

6 CALIFORNIA STATE POLICE
7 (CALIFORNIA HIGHWAY POLICE).

8 COUNTY OF SAN DIEGO HEALTH AND
9 HUMAN SERVICES AGENCY (HHSA)
10 FORENSIC SERVICES UNIT, SAN DIEGO,
11 CALIFORNIA.

12 HERITAGE SECURITY SERVICES.

13 TRANSIT SYSTEM SECURITY.

14 FORT HERITAGE COURIER SERVICE.

15 VEOLIA ENVIRONNEMENT.

16 VEOLIA TRANSPORTATION SERVICES,
17 INC.

18 VEOLIA ENVIRONMENTAL SERVICES.

19 VEOLIA WATER NORTH AMERICA.

20 VEOLIA WATER AMERICA, LLC.

21 VEOLIA TRANSPORT.

22 VEOLIA VERKEHR.

23 CONNEX.

24 SAN DIEGO METROPOLITAN TRANSIT
25 SYSTEM (SDMTS).

26 SAN DIEGO TROLLEY, INC. (SDTI).

27 SAN DIEGO TRANSIT CORPORATION
28

(SDTC).

SAN DIEGO AND ARIZONA EASTERN
(SD AND AE) RAILWAY COMPANY.

SAN DIEGO VINTAGE TROLLEY, INC.

SANDAG.

NORTH COUNTY TRANSIT DISTRICT
(NCTD).

)

COMPLAINT FOR DAMAGES

JANET QUINLAN

Individually and in his capacity as Employee and Property Manager, Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, United States of America, hereinafter "U.S.A".

MICHELLE PROSEC

Individually and in his capacity as Employee and District Manager, Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

MURVIN MOTZ

Individually and in his capacity as Chief Executive Officer, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

ETTA JOHNSON

Individually and in his capacity as Administrative Assistant, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349, U.S.A.

B. WAYNE HUGHES

Individually and in his capacity as Chairman, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

RONALD L. HAVNER, JR.

Individually and in his capacity as Chairman of The Board, Chief Executive Officer and President, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

JOHN REYES

1 Individually and in his capacity as Senior Vice President, Chief Financial Officer, Public
2 Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F,
3 Douglasville, Georgia 30135, U.S.A.

4 SHAWN L. WEIDMAN

5 Individually and in his capacity as Senior Vice President, Chief Operating Officer, Public
6 Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F,
7 Douglasville, Georgia 30135, U.S.A.

8 DAVID DOLL

9 Individually and in his capacity as Senior Vice President, Public Storage, Inc., 701 Western Ave,
10 Glendale, California 91201-2349 and 3313 Highway 5, Suite F, Douglasville, Georgia 30135,
11 U.S.A.

12 STEVEN M. GLICK

13 Individually and in his capacity as Senior Vice President and Chief Legal Officer, Public
14 Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F,
15 Douglasville, Georgia 30135, U.S.A.

16 CANDICE N. KROLL

17 Individually and in his capacity as Senior Vice President Human Resources, Public Storage, Inc.,
18 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F, Douglasville,
19 Georgia 30135, U.S.A.

20 MARK C. GOOD

21 Individually and in his capacity as Senior Vice President and Chief Operating Officer, Public
22 Storage, Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F,
23 Douglasville, Georgia 30135, U.S.A.

24 JOHN EVANS

25 Individually and in his capacity as Director, Human Resources, Public Storage, Inc., 701
26 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F, Douglasville,
27 Georgia 30135, U.S.A.

28 DAVID P. SINGELYN

Individually and in his capacity as President, Public Storage Canadian Properties, Public Storage,
Inc., 701 Western Ave, Glendale, California 91201-2349 and 3313 Highway 5, Suite F,
Douglasville, Georgia 30135, U.S.A.

SARA KIM

Individually and in his capacity as Vice President, Counsel and Assistant Secretary, Public
Storage Canadian Properties, Public Storage, Inc., 701 Western Ave, Glendale, California
91201-2349 and 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

ANDREW J. MACDOUGALL

1 Individually and in his capacity as Secretary, Public Storage Canadian Properties, Public
2 Storage, Inc., 701 Western Ave, Glendale, California 91201-2349, U.S.A.

3 **PINO SPANO**

4 Individually and in his capacity as Vice President, Operations, Public Storage Canadian
5 Properties, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349, U.S.A.

6 **WILLIAM F. ARDELL**

7 Individually and in his capacity as Lead Director of the Audit Committee, Public Storage
8 Canadian Properties, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349,
9 U.S.A.

10 **ROLAND CARDY**

11 Individually and in his capacity as Lead Director of the Audit Committee, Public Storage
12 Canadian Properties, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349,
13 U.S.A.

14 **CHARLES BARBO**

15 Individually and in his capacity as Chairman and Chief Executive Officer, Public Storage
16 Canadian Properties, Public Storage, Inc., 701 Western Ave, Glendale, California 91201-2349,
17 and 1155 Valley Street, Suite 400, Seattle, Washington 98109, U.S.A.

18 **DAVID K. GRANT**

19 Individually and in his capacity as President, Chief Executive Officer and Chief Financial
20 Officer, Public Storage Canadian Properties, Public Storage, Inc., 701 Western Ave, Glendale,
21 California 91201-2349 and 1155 Valley Street, Suite 400, Seattle, Washington 98109, U.S.A.

22 **AMY TOTENBERG**

23 Individually and in her capacity as Judge, United States District Court Northern District of
24 Georgia, 75 Spring Street, S.W, Atlanta, Georgia, 30303 and as in USDC Case No. 1:12-CV-
25 01788-AT.

26 **E. CLAYTON SCOFIELD, III.**

27 Individually and in his capacity as Magistrate Judge, United States District Court Northern
28 District of Georgia, 75 Spring Street, S.W, Atlanta, Georgia, 30303 and as in USDC Case No.
1:12-CV-01788-AT.

JAMES N. HATTEN

Individually and in his capacity as Clerk of Court, United States District Court Northern District
of Georgia, 75 Spring Street, S.W, Atlanta, Georgia, 30303 and as in USDC Case No. 1:12-CV-
01788-AT.

REBECCA V. BACHELOR

Individually and in his capacity as Deputy Clerk of Court, United States District Court Northern
District of Georgia, 75 Spring Street, S.W, Atlanta, Georgia, 30303 and as in USDC Case No.
1:12-CV-01788-AT.

1 LAUREL BEELER

2 Individually and in her capacity as Judge, United States District Court Northern District of
3 California, 450 Golden Gate Avenue, San Francisco, California 94102 and as in USDC Case No.
4 CV12-01879LB.

5 RICHARD W. WIEKING

6 Individually and in his capacity as Clerk of Court, United States District Court Northern District
7 of California, 450 Golden Gate Avenue, San Francisco, California 94102 and as in USDC Case
8 No. CV12-01879LB.

9 LASHANDA SCOTT

10 Individually and in her capacity as Deputy Clerk of Court, United States District Court Northern
11 District of California, 450 Golden Gate Avenue, San Francisco, California 94102 and as in
12 USDC Case No. CV12-01879LB.

13 JOHN A. HOUSTON

14 Individually and in his capacity as Judge, United States District Court Southern District of
15 California, 880 Front St, San Diego, California 92101, U.S.A and as in USDC Case No. 11-CV-
16 1906-JAH (WVG) and USDC Case No. 3-11-CV-1808-JAH(BLM).

17 W. SAMUEL HAMRICK, JR

18 Individually and in his capacity as Clerk of Court, United States District Court Southern District
19 of California, 880 Front St, Suite 4290, San Diego, California 92101, U.S.A and as in USDC
20 Case No.11-CV-1906-JAH (WVG) and USDC Case No. 3-11-CV-1808-JAH (BLM).

21 S/J PETERSEN

22 Individually and in his/her capacity as Deputy Clerk of Court, United States District Court
23 Southern District of California, 880 Front St, Suite 4290, San Diego, California 92101, U.S.A
24 and as in USDC Case No.11-CV-1906-JAH(WVG) and USDC Case No. 3-11-CV-1808-
25 JAH(BLM).

26 THOMAS MONTGOMERY

27 Individually and in his capacity as County Counsel, Office of County Counsel, County
28 Administration Center, 1600 Pacific Highway, Room 355, San Diego, California, 92101, U.S.A.

JERRY SANDERS

Individually and in capacity as Mayor, City of San Diego, California, City Administration
Building, 202 C Street, 11th Floor, San Diego, California 92101, U..S.A.

DAVID J. DANIELSEN

Individually and in his capacity as Judge, Superior Court of California San Diego County, 220
W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-1906-
JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of California
San Diego County Case No. M098172.

1 **FREDERICK MAGUIRE**

2 Individually and in his capacity as Judge, Superior Court of California San Diego County, 220
3 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-1906-
4 JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of California
5 San Diego County Case No. M098172.

6 **LEE C. WITHAM**

7 Individually and in his capacity as Commissioner, Superior Court of California San Diego
8 County, 220 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-
9 1906- JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of
10 California San Diego County Case No. M098172.

11 **ROGER W. KRAUEL**

12 Individually and in his capacity as Judge, Superior Court of California San Diego County, 220
13 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-1906-
14 JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of California
15 San Diego County Case No. M098172.

16 **JOHN N. BLAIR**

17 Individually and in his capacity as Commissioner, Superior Court of California San Diego
18 County, 220 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-
19 1906- JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of
20 California San Diego County Case No. M098172.

21 **ROBERT C. RICE**

22 Individually and in his capacity as Commissioner, Superior Court of California San Diego
23 County, 220 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-
24 1906- JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of
25 California San Diego County Case No. M098172.

26 **SANDRA L. BERRY**

27 Individually and in his capacity as Commissioner, Superior Court of California San Diego
28 County, 220 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-
1906- JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of
California San Diego County Case No. M098172.

KERI G. KATZ

Individually and in his capacity as Commissioner, Superior Court of California San Diego
County, 220 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-
1906- JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of
California San Diego County Case No. M098172.

DESIREE A. BRUCE-LYLE

Individually and in his capacity as Judge, Superior Court of California San Diego County, 220
W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-1906-

JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of California San Diego County Case No. M098172.

KAREN A. RILEY

Individually and in his capacity as Commissioner, Superior Court of California San Diego County, 220 W. Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-1906- JAH(WVG), USDC Case No. 3-11-CV-1808-JAH(BLM) and The Superior Court of California San Diego County Case No. M098172.

R.T HENRIZI

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

HIME ALVARADO

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

P. RORRISON

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

KEVIN C. RAUSIS

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

K. KINNEY

Individually and in her capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

PATRICK SULLIVAN

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

U. HARVEY

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

KISTER (MR)

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

K.P. LEWAK

Individually and in his capacity as Police Officer, San Diego Police Department, 1401 Broadway, San Diego, California, U.S.A.

SARAH SUTTER

1 Individually and in her capacity as Police Officer, San Diego Police Department, 1401
2 Broadway, San Diego, California, U.S.A.

3 JOEL VOSS

4 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
5 Broadway, San Diego, California, U.S.A.

6 SCHENKLEBERG

7 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
8 Broadway, San Diego, California, U.S.A.

9 ZACH BRADLEY

10 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
11 Broadway, San Diego, California, U.S.A.

12 ED

13 Individually and in his capacity as , Property Room Employee/Supervisor, San Diego Police
14 Department, 1401 Broadway, San Diego, California, U.S.A.

15 PAUL COOPER

16 Individually and in his capacity as Counsel to the Chief of Police, San Diego Police Department,
17 1401 Broadway, San Diego, California, U.S.A.

18 WILLIAM LANSDOWNE

19 Individually and in his capacity as Chief of Police, San Diego Police Department, 1401
20 Broadway, San Diego, California, U.S.A and as in USDC Case No. 11-CV-1906-JAH(WVG)
21 and USDC Case No. 3-11-CV-1808-JAH(BLM).

22 MICHAEL CASH

23 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
24 Broadway, San Diego, California, U.S.A.

25 CHRIS BALL

26 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
27 Broadway, San Diego, California, U.S.A.

28 GUY SWANGER

Individually and in his capacity as Police Officer, San Diego Police Department, 1401
Broadway, San Diego, California, U.S.A.

JAMES COLLINS

Individually and in his capacity as Police Officer, San Diego Police Department, 1401
Broadway, San Diego, California, U.S.A.

BOYD LONG

1 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
2 Broadway, San Diego, California, U.S.A.

3 CESAR SOLIS

4 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
5 Broadway, San Diego, California, U.S.A.

6 TONY MCELROY

7 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
8 Broadway, San Diego, California, U.S.A.

9 SARAH CRIEGHTON

10 Individually and in her capacity as Police Officer, San Diego Police Department, 1401
11 Broadway, San Diego, California, U.S.A.

12 DAVID ROHOWITZ

13 Individually and in his capacity as Police Officer, San Diego Police Department, 1401
14 Broadway, San Diego, California, U.S.A.

15 S. BOYKIN

16 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
17 Diego, California, U.S.A.

18 K. ARMENTANO

19 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
20 Diego, California, U.S.A.

21 S. ERACA

22 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
23 Diego, California, U.S.A.

24 T. WOOD

25 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
26 Diego, California, U.S.A.

27 K. LAWRENCE

28 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
Diego, California, U.S.A.

J. HAGEL

Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
Diego, California, U.S.A.

ROBERT ADAMS

Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
Diego, California, U.S.A.

1 ALAN NICHOLAS

2 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
3 Diego, California, U.S.A.

4 E. WISEMAN

5 Individually and in his capacity as Officer, San Diego Police Department, 1401 Broadway, San
6 Diego, California, U.S.A.

7 JAN GOLDSMITH

8 Individually and in his capacity as City Attorney, Office of City Attorney, City of San Diego,
9 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A and as in USDC Case No. 11-
10 CV-1906-JAH(WVG) and USDC Case No. 3-11-CV-1808-JAH(BLM).

11 ONU OMORDIA

12 Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
13 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

14 HEILY HERNANDEZ

15 Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
16 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

17 L. VOGLITANZ

18 Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
19 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

20 MARYJO LANZAFARE

21 Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
22 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

23 ANDREW JONES

24 Individually and in his capacity as Attorney, Office of City Attorney, City of San Diego, 1200
25 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

26 DAVID GREENBERG

27 Individually and in his capacity as Attorney, Office of City Attorney, City of San Diego, 1200
28 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

TRICIA PUMMIL

Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

TESSA HEUNIS

Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

1 ANDRES CARNAHAN

2 Individually and in his/her capacity as Attorney, Office of City Attorney, City of San Diego,
3 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

4 KRIST HEIN

5 Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
6 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

7 MAKINI HAMMOND

8 Individually and in his/her capacity as Attorney, Office of City Attorney, City of San Diego,
9 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

10 L. EASTON

11 Individually and in her capacity as Attorney, Office of City Attorney, City of San Diego, 1200
12 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

13 D. BURLINS

14 Individually and in his/her capacity as Attorney, Office of City Attorney, City of San Diego,
15 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

16 M. ROBERTSON

17 Individually and in his/her capacity as Attorney, Office of City Attorney, City of San Diego,
18 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

19 S. PARK

20 Individually and in his/her capacity as Attorney, Office of City Attorney, City of San Diego,
21 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

22 A. WILBURN

23 Individually and in his/her capacity as Attorney, Office of City Attorney, City of San Diego,
24 1200 Third Ave, Suite 1620, San Diego, California, 92101, U.S.A.

25 SOLOMON CHANG

26 Individually and in his capacity as Attorney, Office of The Public Defender San Diego County,
27 450 B St, Suite 900, San Diego, California, 92101, U.S.A.

28 BRIAN SCHMIDT

Individually and in his capacity as Attorney, Office of The Public Defender San Diego County,
450 B St, Suite 900, San Diego, California, 92101, U.S.A.

KATHERINE BRANER

Individually and in her capacity as Attorney, Office of The Public Defender San Diego County,
450 B St, Suite 900, San Diego, California, 92101, U.S.A.

MARYJO BARR

1 Individually and in her capacity as Attorney, Office of The Public Defender San Diego County,
2 450 B St, Suite 900, San Diego, California, 92101, U.S.A.

3 HENRY C. COKER

4 Individually and in his capacity as Public Defender, Office of The Public Defender San Diego
County, 450 B St, Suite 900, San Diego, California, 92101, U.S.A.

5 SUSAN MCINERNEY

6 Individually and in her capacity as Attorney, Office of The Public Defender San Diego County,
7 450 B St, Suite 900, San Diego, California, 92101, U.S.A.

8 L. GARCIA

9 Individually and in his/her capacity as Attorney, Office of The Public Defender San Diego
County, 450 B St, Suite 900, San Diego, California, 92101, U.S.A

10 L. STERN

11 Individually and in his/her capacity as Attorney, Office of The Public Defender San Diego
County, 450 B St, Suite 900, San Diego, California, 92101, U.S.A.

12 ROBERT J. STALL, JR.

13 Individually and in his capacity as Director, Office of Assigned Counsel San Diego County, 450
14 B St, Suite 840, San Diego, California, 92101, U.S.A.

15 MICHAEL BEGOVICH

16 Individually and in his capacity as Deputy Director, Office of Assigned Counsel San Diego
County, 450 B St, Suite 840, San Diego, California, 92101, U.S.A.

17 MILLY DUROVIC

18 Individually and in his/her capacity as Of Counsel, Office of Assigned Counsel San Diego
County, 450 B St, Suite 840, San Diego, California, 92101, U.S.A.

19 VENETA JACOBS

20 Individually and in his/her capacity as Felony Case Assigning Employee, Office of Assigned
21 Counsel San Diego County, 450 B St, Suite 840, San Diego, California, 92101, U.S.A.

22 MICHAEL HAWKINS

23 Individually and in his capacity as Pro Per Coordinator, Office of Assigned Counsel San Diego
County, 450 B St, Suite 840, San Diego, California, 92101, U.S.A.

24 R. PADILLA

25 Individually and in his capacity as Arresting and Booking Officer, San Diego Harbor Police,
26 3380 Harbor Drive, San Diego, California, 92101, U.S.A.

27 TAYLOR (MR)

28 Individually and in his capacity as Co-arresting Officer, San Diego Harbor Police, 3380 Harbor
Drive, San Diego, California, 92101, U.S.A.

1 SABBAGH (MR)

2 Individually and in his capacity as Co-arresting Officer, San Diego Harbor Police, 3380 Harbor
3 Drive, San Diego, California, 92101, U.S.A.

4 S. AFHOOK

5 Individually and in his capacity as Co-arresting Officer, San Diego Harbor Police, 3380 Harbor
6 Drive, San Diego, California, 92101, U.S.A.

7 JOHN A. BOLDUC

8 Individually and in his capacity as Chief of Police, San Diego Harbor Police, 3380 Harbor Drive,
9 San Diego, California, 92101, U.S.A.

10 BRIAN JENSEN

11 Individually and in his capacity as Officer, San Diego Harbor Police, 3380 Harbor Drive, San
12 Diego, California, 92101, U.S.A.

13 KIMBERLY A. FIVES

14 Individually and in her capacity as Officer, San Diego Harbor Police, 3380 Harbor Drive, San
15 Diego, California, 92101, U.S.A.

16 ROURCK (MR)

17 Individually and in his capacity as Arrest and Booking Sheriffs' Deputy, San Diego County
18 Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San
19 Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

20 MONIKA PALMERIN

21 Individually and in her capacity as Arrest and Booking Sheriffs' Deputy, San Diego County
22 Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San
23 Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

24 C.H. WALSH

25 Individually and in her capacity as Arrest and Booking Sheriffs' Deputy, San Diego County
26 Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San
27 Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

28 MIKE OTIS

Individually and in his capacity as Property and Evidence Custodian, San Diego County Sheriffs'
Department Property and Evidence Unit, 5255 Mount Etna Drive, San Diego, California, U.S.A.

NORM CASTILLO

Individually and in his capacity as Property and Evidence Unit Employee, San Diego County
Sheriffs' Department Property and Evidence Unit, 5255 Mount Etna Drive, San Diego,
California, U.S.A.

DAILEY (MR)

1 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
2 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

3 L.A. RIOS

4 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
5 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

6 RIA (MS)

7 Individually and in her capacity as Medical Personnel, San Diego County Sheriffs' Department,
8 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193), San Diego, California, 92101,
U.S.A.

9 D. HANSEN

10 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
11 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

12 J. JOHNS

13 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
14 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

15 LAWSON (MR)

16 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
17 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

18 JOHN DOE WHITE MALE SHERIFFS DEPUTY WEARING BULLET-PROOF VEST AND
19 ACCOMPLICE OF SHERIFFS' DEPUTIES D. HANSEN AND J. JOHNS at about 12:15am
20 PST on May 22, 2012 in the lobby at the San Diego County Central Jail, 1730 Front St, San
Diego, California.

21 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
22 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

23 WILLIAM D. GORE

24 Individually and in his capacity as Sheriff, San Diego County Sheriffs' Department, San Diego,
California, 92101, U.S.A.

25 THOMAS J. COOKE

26 Individually and in his capacity as Under-Sheriff, San Diego County Sheriffs' Department, San
27 Diego, California, 92101, U.S.A.

28 R. SALAZAR

1 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
2 San Diego Central Jail, San Diego, California, 92101, U.S.A.

3 A.P. SETTER

4 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
5 San Diego Central Jail, San Diego, California, 92101, U.S.A.

6 HATHAWAY (MR)

7 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
8 San Diego Central Jail, Facility 8, George F. Bailey Detention Facility, San Diego, California,
9 92101, U.S.A.

10 BIGGS (MR)

11 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
12 San Diego Central Jail, Facility 8, George F. Bailey Detention Facility, San Diego, California,
13 92101, U.S.A.

14 T. HANDSON

15 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
16 San Diego Central Jail, San Diego, California, 92101, U.S.A.

17 ACEVADO (MR)

18 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
19 San Diego Central Jail, Facility 8, George F. Bailey Detention Facility, San Diego, California,
20 92101, U.S.A.

21 P. LACHAPPELL

22 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
23 San Diego Central Jail, Facility 8, George F. Bailey Detention Facility, San Diego, California,
24 92101, U.S.A.

25 G.A. NAVARRO

26 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
27 San Diego Central Jail, Facility 8, George F. Bailey Detention Facility, San Diego, California,
28 92101, U.S.A.

JOHNSON (MR)

Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

B. RICHARDSON

Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

JACKSON (MR)

Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

SMITH (MR)

Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

POWELL (MR)

Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

M.J. SAUNDERS

Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

ROURCK (MR)

Individually and in his capacity as Arrest and Booking Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

MONIKA PALMERIN

Individually and in her capacity as Arrest and Booking Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

C.H. WALSH

Individually and in her capacity as Arrest and Booking Sheriffs' Deputy, San Diego County Sheriffs' Department, San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

MIKE OTIS

Individually and in his capacity as Property and Evidence Custodian, San Diego County Sheriffs' Department Property and Evidence Unit, 5255 Mount Etna Drive, San Diego, California, U.S.A.

NORM CASTILLO

Individually and in his capacity as Property and Evidence Unit Employee, San Diego County Sheriffs' Department Property and Evidence Unit, 5255 Mount Etna Drive, San Diego, California, U.S.A.

DAILEY (MR)

1 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
2 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

3 L.A. RIOS

4 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
5 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

6 RIA (MS)

7 Individually and in her capacity as Medical Personnel, San Diego County Sheriffs' Department,
8 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193), San Diego, California, 92101,
U.S.A.

9 D. HANSEN

10 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
11 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

12 J. JOHNS

13 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
14 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

15 LAWSON (MR)

16 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
17 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

18 JOHN DOE WHITE MALE SHERIFFS DEPUTY WEARING BULLET-PROOF VEST AND
19 ACCOMPLICE OF SHERIFFS' DEPUTIES D. HANSEN AND J. JOHNS at about 12:15am
20 PST on May 22, 2012 in the lobby at the San Diego County Central Jail, 1730 Front St, San
Diego, California.

21 Individually and in his capacity as Sheriffs' Deputy, San Diego County Sheriffs' Department,
22 San Diego Central Jail, 1730 Front St, P.O. Box 939062 (92193) San Diego, Facility 8, George
F. Bailey Detention Facility, San Diego, California, 92101, U.S.A.

23 M. JOHNSON

24 Individually and in his capacity as Officer, California State Police Department (California
25 Highway Patrol), 9330 Farnham St, San Diego, California, 92123, and 4902 Pacific Highway,
San Diego, California, U.S.A.

26 MATTHEW F. CARROLL

27 Individually and in his capacity as Staff Psychiatrist, County of San Diego Health and Human
28 Services Agency (HHSA), Behavioral Health Services, Forensic Psychiatry Unit, 220 West

Broadway, #1003, San Diego, California, 92101 and 3255 Camino Del Rio South, San Diego, California 92108, U.S.A.

JEREMY FLAGEL

Individually and in his capacity as Staff Psychiatrist, County of San Diego Health and Human Services Agency (HHSA), Behavioral Health Services, Forensic Psychiatry Unit, 220 West Broadway, #1003, San Diego, California, 92101 and 3255 Camino Del Rio South, San Diego, California 92108, U.S.A.

LAWRENCE RICHMAN

Individually and in his capacity as Chief Executive Officer and Founder, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

MASCHMEIER (MR)

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

MAX NAVARRO

Individually and in his capacity as Arresting Security Officer, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

ZACHARY COLLINS

Individually and in his capacity as Arresting Security Officer, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

RACHEL TYNER

Individually and in her capacity as Security Officer, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

QUEEN (MR)

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

L. AMARIZ

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California.

A.DIAZ

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 G. BURTON

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 E. ALILIN

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 L. MARTINEZ

13 Individually and in his/her capacity as Security Officer, Heritage Security Services, Transit
14 System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 L. FEWELL

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 D. BELVIS

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 K. LYLE

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 M. VICCARIELLO

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

D. HAMADA

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

R.P. POMEROY

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 E. AGUILAR

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 C. HERNANDEZ

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 R. ROGERS

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 T. HUGBEE

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 M. RICO

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 J. RENTERIA

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 R. GRAHAM

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

J. DIEGA

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

T.R. JOSEPH

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 F. MIRELES

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 C. TORRES

9 Individually and in his/her capacity as Security Officer, Heritage Security Services, Transit
10 System Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 K. GARCIA

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 P. ALAMILLO

17 Individually and in her capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 D. REAVES

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 R. FUENTEVILLA

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 R. FAVELO

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

J. LAPAN

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

P. COTHAS

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 **R. OROZCO**

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 **V. GARCIA**

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 **M. REGUSTERS**

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 **F. CONTRERAS**

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 **LEHNHER (MR)**

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 **K. SPIGHT**

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 **J. MARTINEZ**

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

A.MOYA

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego, California

C. MINER

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 C. YEAGER

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 L. COLLIER

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 PITT (MR)

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 M. KOSAK

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 C. SANDEZ

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 P. ROMERO

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 A.SPIEDEL

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

T. THOMAS

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

J. JAMESON

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 J. KING

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 T. OKALSKI

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 S. RODRIGUEZ

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 E. MCKEEVER

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 H. CASTRO

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 J. NUTTING

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 A. IZZARELLI

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

H. ALATORE

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

M. FARIAS

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 J. ROMERO

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 E. TRUJILLO

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 L. GONZALES

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 A. WILLIAMS

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 H. ESTRADA

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 CHAN (MR)

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 HINOJOS (MR)

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

E. BIBBY

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

S. CORREAU

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 G. EDWARDS

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 H. NAVARRETTE

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 D. NAPOLEON

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 Y. ADIBOYE

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 T. WADE

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 E. RANDES

25 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
26 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
27 California.

28 J. MARRS

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

L. ROBERTS

Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
California.

M. VARGES

1 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
2 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
3 California.

4 R. OAKLEY

5 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
6 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
7 California.

8 M. CARTER

9 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
10 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
11 California.

12 J. PARKER

13 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
14 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
15 California.

16 G. BARNETTE

17 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
18 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
19 California.

20 T. ASKREN

21 Individually and in his capacity as Security Officer, Heritage Security Services, Transit System
22 Security and Fort Heritage Courier Service, 1260 Morena Blvd, Suite 200, San Diego,
23 California.

24 CAROLYN SUESS

25 Individually and in her capacity as Operations Supervisor, San Diego Metropolitan Transit
26 System (SDMTS), San Diego, California.

27 PHIL STIEGLIZ

28 Individually and in his capacity as Operations Supervisor, San Diego Metropolitan Transit
System (SDMTS), San Diego, California.

JOSE GARCIA

Individually and in his capacity as Operations Supervisor, San Diego Metropolitan Transit
System (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
California.

JOHN FITCH

Individually and in his capacity as Operations Supervisor, San Diego Metropolitan Transit
System (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
California.

1 JOHN NESBITT

2 Individually and in his capacity as Operations Supervisor, San Diego Metropolitan Transit
3 System (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
4 California.

5 RICARDO

6 Individually and in his capacity as Employee, San Diego Metropolitan Transit System (SDMTS),
7 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon, California.

8 ROSE SORILLON

9 Individually and in her capacity as Operations Supervisor, San Diego Metropolitan Transit
10 System (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
11 California.

12 JOHN DOE WHITE MALE DRIVER SDMTS 44 BUS ROUTE 325 ABOUT 9:08PM PST ON
13 DECEMBER 14, 2009 FROM LINDA VISTA ROAD TO OLD TOWN TRANSIT STATION
14 SAN DIEGO CALIFORNIA.

15 Individually and in his capacity as Bus Driver, San Diego Metropolitan Transit System
16 (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
17 California.

18 JOHN DOE HISPANIC MALE DRIVER SDMTS 992 BUS ROUTE 2775 ABOUT 8:58AM
19 PST ON MARCH 17, 2011 INCIDENT ON BROADWAY AND SETTLER ACROSS FROM
20 AMERICA PLAZA DOWNTOWN SAN DIEGO CALIFORNIA.

21 Individually and in his capacity as Bus Driver, San Diego Metropolitan Transit System
22 (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
23 California.

24 JOHN DOE WHITE MALE DRIVER SDMTS 120 BUS ROUTE 343 ABOUT 4:42PM PST
25 ON MARCH 15, 2011 INCIDENT ON GENESEE AVE AND HEALTHCARE DRIVE, SAN
26 DIEGO CALIFORNIA.

27 Individually and in his capacity as Bus Driver, San Diego Metropolitan Transit System
28 (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
California.

JANE DOE BLACK FEMALE DRIVER SDMTS 105 BUS ROUTE 302 ABOUT 10:08AM
PST ON JULY 26, 2009 INCIDENT ON MILTON ST AND MORENA BLVD, SAN DIEGO
CALIFORNIA.

Individually and in her capacity as Bus Driver, San Diego Metropolitan Transit System
(SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
California.

JANE DOE WHITE FEMALE DRIVER SDMTS 120 BUS ROUTE 1604 ABOUT 10:50AM
PST ON AUGUST 21, 2011 INCIDENT AT FASHION VALLEY TRANSIT STATION, SAN
DIEGO CALIFORNIA.

1 Individually and in her capacity as Bus Driver, San Diego Metropolitan Transit System
2 (SDMTS), 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
California.

3 PAUL PABLONSKI

4 Individually and in his capacity as Chief Executive Officer, San Diego Metropolitan Transit
5 System (SDMTS), San Diego, California, 3650 Main St, Chula Vista, California and 1213 N.
Johnson Ave, El Cajon, California.

6 C. MICHAEL COWETT

7 Individually and in his capacity as General Counsel, San Diego Metropolitan Transit System
8 (SDMTS), San Diego, California, 3650 Main St, Chula Vista, California and 1213 N. Johnson
Ave, El Cajon, California.

9 TIFFANY LORENZEN

10 Individually and in her capacity as General Counsel, San Diego Metropolitan Transit System
11 (SDMTS), San Diego, California, 3650 Main St, Chula Vista, California and 1213 N. Johnson
Ave, El Cajon, California.

12 JEFF STUMBO

13 Individually and in his capacity as Director, San Diego Metropolitan Transit System (SDMTS),
14 San Diego, California, 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El
Cajon, California.

15 SHARON COONEY

16 Individually and in her capacity as Director of Court Affairs and Community Relations, San
17 Diego Metropolitan Transit System (SDMTS), San Diego, California, 3650 Main St, Chula
Vista, California and 1213 N. Johnson Ave, El Cajon, California.

18 HENRI PRUGLIO

19 Individually and in his capacity as Chairman, Veolia Environnement, Veolia Transportation
20 Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E. Butterfield Road, Suite 300,
Lombard, IL 60148, 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
21 California.

22 ALAN MOLDAWER

23 Individually and in his capacity as General Counsel, Veolia Environnement, Veolia
24 Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E. Butterfield
Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California and 1213 N.
Johnson Ave, El Cajon, California.

25 LARRY STEFFES

26 Individually and in his capacity as Assistant General Counsel, Veolia Environnement, Veolia
27 Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E. Butterfield
Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California and 1213 N.
28 Johnson Ave, El Cajon, California.

1 MARK L. JOSEPH

2 Individually and in his capacity as Chairman and Chief Executive Officer, Veolia
3 Environnement, Veolia Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex,
4 720 E. Butterfield Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California
and 1213 N. Johnson Ave, El Cajon, California.

5 JANET DAVIS

6 Individually and in her capacity as Vice President, Business Development, Veolia
7 Environnement, Veolia Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex,
8 720 E. Butterfield Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California
and 1213 N. Johnson Ave, El Cajon, California.

9 CHRISTOPHER BRYAN

10 Individually and in his capacity as Director, Business Development, Veolia Environnement,
11 Veolia Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E.
Butterfield Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California and
1213 N. Johnson Ave, El Cajon, California.

12 DONALD SAUNDERS

13 Individually and in his capacity as Chief Operating Officer, Veolia Environnement, Veolia
14 Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E. Butterfield
15 Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California and 1213 N.
Johnson Ave, El Cajon, California.

16 TOM DOWNS

17 Individually and in his capacity as Chairman, Veolia Environnement, Veolia Transportation
18 Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E. Butterfield Road, Suite 300,
Lombard, IL 60148, 3650 Main St, Chula Vista, California and 1213 N. Johnson Ave, El Cajon,
California.

19 VALERIE MICHAEL

20 Individually and in her capacity as Director, Corporate Communications, Veolia Environnement,
21 Veolia Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E.
22 Butterfield Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California and
1213 N. Johnson Ave, El Cajon, California.

23 JAN HORSTMANN

24 Individually and in his capacity as Chief Financial Officer, Veolia Environnement, Veolia
25 Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, 720 E. Butterfield
Road, Suite 300, Lombard, IL 60148, 3650 Main St, Chula Vista, California and 1213 N.
Johnson Ave, El Cajon, California.

26 MARCUS WANG

27 Individually and in his capacity as Emergency Room Physician, Scripps Mercy Hospital, San
28 Diego, California, U.S.A.

Co-defendants

COMPLAINT FOR DAMAGES

Chibueze C. Anaeme, plaintiff, respectfully files this complaint for damages following FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2671 et seq. and other causes of action provided under the United States Constitution, Statutory provisions and or laws of the applicable state(s).

JURISDICTION AND VENUE

1. Jurisdiction of the court is invoked pursuant to 28 U.S.C Sections 1331, 1337 and 1367. The actions, omissions and transactions alleged to be unlawful arise within the jurisdiction of the United States District Court for the District of Nevada, United States District Court for the Northern District of Georgia, the United States District Court for the Northern District of California respectively.

2. Plaintiff further invokes the pendant jurisdiction of this court to hear and decide claims arising from constitutional and statutory provisions as is/are applicable.

PARTIES

3. Plaintiff, Chibueze C. Anaeme is a black male of African origin and a resident of Albuquerque, Bernalillo County, New Mexico, U.S.A.

4. Defendant, United States of America as party and as is liable for its acts and the acts of its individual agents and/or co-defendants in aforesaid cause.

5. Individual co-defendants and/or defendants' agents Public Storage, Inc., all locations including but not limited to Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A collectively named "Public Storage cluster" are companies engaged in the ownership and operation of storage facilities throughout the United States of America, Canada and Europe to name a few confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

6. Individual co-defendant and/or defendants' agent State of California collectively named "State of California cluster" is a government entity within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

7. Individual co-defendant and/or defendants' agent San Diego County California collectively named "San Diego County cluster" is a government entity within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

8. Individual co-defendant and/or defendants' agent Office of County Counsel, San Diego County, California, 1600 Pacific Highway, Room 355, San Diego, California 92101, U.S.A collectively named "County Counsel cluster" is a government agency engaged in the practice of

1 law and represents various county agencies in San Diego County, California within the meaning
2 of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

3 9. Individual co-defendants and/or defendants agent The City of San Diego, California
4 collectively named "City Administration cluster" is a government entity within the meaning of
5 FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

6 10. Individual co-defendants and/or defendants' agents Office of The Public Defender San Diego
7 County, San Diego, California and Office of Assigned Counsel San Diego County, San Diego,
8 California collectively named "Public Defender Assigned Counsel cluster" are government
9 entities engaged in the practice of law within meaning of FTCA 28 U.S.C Sections 1346, 1402,
10 2401, 2402, 2422, 2671 et seq.

11 11. Individual co-defendant and/or defendants' agent Office of The City Attorney, City of San
12 Diego, located on 1200 Third Ave, Suite 1300, San Diego, California collectively named "City
13 Attorney cluster" is a government entity engaged in the practice of law and represents various
14 municipal agencies in San Diego, California within the meaning of FTCA 28 U.S.C Sections
15 1346, 1402, 2401, 2402, 2422, 2671 et seq.

16 12. Individual co-defendant and/or defendants' agent San Diego Police Department collectively
17 named "San Diego Police cluster" located on 1401 Broadway, San Diego, California is a law
18 enforcement government agency proscribed within FTCA 28 U.S.C Sections 1346, 1402, 2401,
19 2402, 2422, 2671 et seq.

20 13. Individual co-defendant and/or defendants' agent San Diego Unified Port District located on
21 3165 Pacific Highway, San Diego, California 92101 and San Diego Harbor Police located on
22 3380 N. Harbor Drive, San Diego, California 92101 collectively named "Port Police cluster" are
23 harbor management and law enforcement government agencies respectively within meaning of
24 FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

25 14. Individual co-defendant and/or defendants' agent San Diego County Sheriffs' Department
26 collectively named "Sheriff cluster" located at the John F. Duffy Administration Center, P.O.
27 Box 939062, San Diego, California 92193, 1730 Front St, San Diego, California, San Diego
28 Central Jail, San Diego, California, Facility 8, George F. Bailey Detention Facility, San Diego,
California to name a few is a law enforcement government agency within meaning of FTCA 28
U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

15 15. Individual co-defendant and/or defendants' agent California State Police Department
16 (California Highway Patrol) collectively named "Highway Patrol cluster" located on 4902
17 Pacific Highway, San Diego, California and 9330 Farnham St, San Diego, California is a law
18 enforcement government agency within the meaning of FTCA 28 U.S.C Sections 1346, 1402,
19 2401, 2402, 2422, 2671 et seq.

20 16. Individual co-defendant and/or defendants' agent San Diego County Health and Human
21 Services Agency (HHSA), Behavioral Health Services, Forensic Psychiatry Unit collectively
22 named "Forensic Services cluster" located on 220 W. Broadway, Room 1003, San Diego,

California is a government agency engaged in the performance of health and human services functions including psychiatric services proscribed within FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

17. Individual co-defendants and/or defendants' agents Heritage Security Services, Transit System Security and Fort Heritage Courier Service collectively named "Transit Fort cluster" located on 1260 Morena Blvd, Suite 200, San Diego, California 92110 are companies engaged in the provision of courier services, armed and unarmed security services and investigative services to the public and to businesses within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

18. Individual co-defendants and/or defendants' agents Veolia Environnement, Veolia Transportation Services, Inc., Veolia Transport, Veolia Verkehr, Connex, San Diego Metropolitan Transit System (SDMTS), San Diego Trolley, Inc. (SDTI), San Diego Transit Corporation (SDTC), San Diego and Arizona Eastern (SD and AE) Railway Company, San Diego Vintage Trolley, Inc., SANDAG, North County Transit District (NCTD) collectively named "Veolia Cluster" are a group of companies engaged in public transportation within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

19. Individual co-defendants and/or defendants' agents Janet Quinlan, Michelle Prosec, Murvin Motz, Michael Foy, Michelle Guthrie, Michelle Pinckey, Etta Johnson, B. Wayne Hughes, Ronald L. Havner, Jr., John Reyes, Shawn L. Weldman, David F. Doll, Steven M. Glick, Candance N. Kroll, Mark C. Good, John Evans, John S. Bauman, David P. Singelyn, Sara Kim, Andrew J. MacDougal, Pino Spano, William F. Ardell, Roland Cardy, Charles Barbo, David K. Grant, Terry Prether and Bruno Roquelo, are officers and or employees of Public Storage, Inc, 701 Western Ave, Glendale, California 91201, U.S.A, Public Storage, Inc., all locations including but not limited to Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A aforerecited collectively named "Public Storage cluster personnel" confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

20. Individual co-defendants and/or defendants' agents Amy Totenberg, E. Clayton Scofield, III., James N. Hatten, S/Rebecca V. Bachelor, United States District Court, 75 Spring Street, S.W, Atlanta, GA 30303 collectively named "Atlanta District cluster" are engaged in the practice of law within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

21. Individual co-defendants and/or defendants' agents Laurel Beeler, Richard W. Wicking and Lashanda Scott, United States District Court, 450 Golden Gate Avenue, San Francisco, CA 94102 collectively named "San Francisco District cluster" are engaged in the practice of law within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

22. Individual co-defendants and/or defendants agents John Houston, W. Samuel Hamrick, Jr. and S/J Petersen collectively named "U.S District Court cluster personnel" are engaged in the practise of or administration of the law as aforerecited pertaining to USDC Case No. 11-CV-1906-JAH(WVG) and USDC Case No. 3-11-CV-1808-JAH(BLM) and within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

23. Individual co-defendants and/or defendants' agents Thomas Montgomery collectively named "County Counsel cluster personnel" Office of County Counsel, 1600 Pacific Highway, Room 355, San Diego, California, 92101, U.S.A. is engaged in the practice of law within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

24. Individual defendants' agent and/or co-defendant Jerry Sanders collectively named "City Administration cluster personnel", City Administration Building, 202 C Street, 11th Floor, San Diego, California 92101 is engaged in city administration within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

25. Individual co-defendants and/or defendants agents David J. Daniels, Frederick Maguire, Roger C. Rice, Sandra L. Berry, Keri G. Katz, Desiree A. Bruce-Lyle, Lee C. Witham, Karen A. Riley and John N. Blair collectively named "Broadway cluster Personnel" located on 220 W. Broadway, San Diego, California and 8950 Clairemont Mesa Blvd, San Diego, California respectively and engaged in the practice of law in San Diego County, California within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

26. Individual co-defendants and/or defendants' agents Onu Omordia, Heily Hernandez, Michael Aguirre, Jan Goldsmith, L. Vogltanz, MaryJo Lanzafare, Andrew Jones, David Greenberg, Tricia Pummil, Tessa Heunis, Andres Carnahan, Kristi Hein, Makini Hammond, L. Easton, D. Rurlines, M. Robertson, S. Park and A. Wilburn collectively named "City Attorney cluster personnel" are engaged in the practice of law and are attorneys and/or employees of the Office of The City Attorney, City of San Diego, California aforerecited within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

27. Individual co-defendants and/or defendants' agents John O' Neill, Deborah Cochran, Graydon "Bud" Wetzler, William Ashley "Lee" Biddle, William Howatt, Faye Detsky and Clyde L. Fuller collectively named "City cluster personnel" are City of San Diego Ethics Commissioners within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

28. Individual co-defendants and/or defendants' agents Michael Hawkins, Robert J. Stall, Jr., Michael Begovich, Milly Durovic and Veneta Jacobs collectively named "Assigned Counsel cluster personnel" are attorneys and/or employees of the Office of Assigned Counsel San Diego County, California engaged in the practice of law within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

29. Individual co-defendants and/or defendants' agents Solomon Chang, Brian Schmidt, L. Stern, L. Garcia, Susan McInerney, Katherine Braner, MaryJo Barr and Henry C. Coker collectively named "Public Defender cluster personnel", are attorneys of the Office of Public Defender San Diego County, California engaged in the practice of law within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

30. Individual co-defendants and/or defendants' agents Hime Alvarado, R.T. Henrizi, P. Rorrison, Kevin C. Rausis, U. Harvey, K. Kinney, Patrick Sullivan, K.P. Lewak, Ed, William Lansdowne, Paul Cooper, Sarah Sutter, Joel Voss, Schenkleberg (Mr), Zach Bradley, Kister

(Mr), Michael Cash, Chris Ball, Guy Swanger, James Collins, Boyd Long, Cesar Solis, Tony McElroy, Sarah Creighton, David Rohowitz, S. Boykin, K. Armentano, S. Eraca, T. Wood, K. Lawrence, J. Hagel, Robert Adams, Alan Nicholas and E. Wiseman collectively named "San Diego Police cluster personnel" are law enforcement personnel with the San Diego Police Department, San Diego, California within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

31. Individual co-defendants and/or defendants agents John O'Neill, Deborah Cochran, Graydon "Bud" Wetzler, William Ashley "Lee" Biddle, William Howatt, Faye Detsky and Clyde L. Fuller collectively named "City cluster personnel" are city of San Diego Ethics Commissioners within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

32. Individual co-defendants and/or defendants agents R. Setter (Mr), Johnson (Mr), B. Richardson, Powell (Mr), Jackson (Mr), Handson (Mr), Smith (Mr), Hathaway (Mr), Acevado (Mr), Salazar (Mr), M.J. Saunders, William Gore, Thomas J. Cooke, Rourck (Mr), Monika Palmerin, C.H. Walsh, Mike Otis, Norm Castillo, L.A. Rois, Dailey (Mr), Ria (Ms), D. Hansen, J. Johns, Lawson (Mr), John Doe white male sheriffs' deputy wearing bullet-proof vest and accomplice of sheriffs' deputies D. Hansen, J. Johns and Lawson (Mr) at about 12:15am PST on May 22, 2012 in the lobby at the San Diego County Central Jail, 1730 Front St, San Diego, California collectively named "Sheriff cluster personnel" are law enforcement officers with the San Diego County Sheriff's Department, San Diego, California within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

33. Individual co-defendants and/or defendants agents R. Padilla, Taylor (Mr), Sabbagh (Mr), S. Afhook, John A. Bolduc, Brian Jensen and Kimberly A. Fives collectively named "Sheriff cluster personnel" are law enforcement officers of the San Diego Harbor Police, San Diego, California within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

34. Individual co-defendants and/or defendants agents Bob Nelson, Scott Peters, Lee Burdick, Michael Bixler, Stephen Padilla, Lou Smith and Robert Valderrama collectively named "Port Commissioners cluster personnel" are members of the Board of Commissioner San Diego Unified Port District engaged in fiduciary, regulatory, advisory and or policy-setting functions within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

35. Individual co-defendant and/or defendants' agent M. Johnson collectively named "California Highway cluster personnel" is a law enforcement officer of the California State Police Department (California Highway Patrol), San Diego, California within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

36. Individual co-defendants and/or defendants agents Matthew F. Carroll and Jeremy Flagel collectively named "Forensic Services cluster personnel" are staff psychiatrists within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

37. Individual co-defendants and/or defendants agents Lawrence Richman, Mascheimer (Mr), Max Navarro, Zachary Collins, Rachel Tyner, Queen (Mr), L. Amariz, A. Diaz, G. Burton, E. Alilin, L. Martinez, L. Fewell, D. Belvis, K. Lyle, M. Viccariello, D. Hamada, R.P. Pomeroy, E. Aguilar, C. Hernandez, R. Rogers, T. Hugbee, M. Rico, J. Renteria, R. Graham, J. Diega, T.R. Joseph, F. Mireles, C. Torres, K. Garcia, P. Alamillo, D. Reaves, R. Fuentavilla, R. Favelo, J. Lapan, P. Cothias, R. Orozco, V. Garcia, M. Regusters, F. Contreras, Lehnher (Mr), K. Spight, J. Martinez, A. Moya, C. Miner, C. Yeager, L. Collier, Pitt (Mr), M. Kosak, C. Sandez, P. Romero, A. Spiedel, T. Thomas, J. Jameson, J. King, T. Okalski, S. Rodriguez, E. McKeever, H. Castro, J. Nutting, A. Izzarelli, H. Alatorre, M. Farias, J. Romero, E. Trujillo, L. Gonzales, A. Williams, H. Estrada, Chan (Mr), Hinojos (Mr), R. Favelo, E. Bibby, S. Correau, Y. Adiboye, T. Wade, E. Randes, J. Marrs, L. Roberts, M. Varges, R. Oakley, M. Carter, J. Parker, G. Barnette and T. Askren collectively named "Heritage Transit cluster personnel" are security officers and/or code compliance officers with Heritage Security Services, San Diego Trolley, Inc and Transit System Security, San Diego, California within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

38. Individual co-defendants and/or defendants agents Carolyn Suess, Phil Stiegliz, Jose Garcia, John Fitch, John Nesbitt, Ricardo, Rose Sorillon, John Doe White Male Driver SDMTS 44 Bus Route 325 about 9:06PM PST on December 14, 2009 from Linda Vista Road to Old Town Transit Station San Diego California, John Doe Hispanic Male Driver SDMTS 992 Bus Route 2775 about 8:55AM PST on March 17, 2011 Incident on Broadway and Settler across from America Plaza Downtown San Diego California, John Doe White Male Driver SDMTS 120 Bus Route 343 about 4:42PM PST on March 15, 2011 Incident on Genesee Ave and Healthcare Drive San Diego California, Jane Doe Black Female Driver SDMTS 105 Bus Route 302 about 10:08AM PST on July 26, 2009 Incident on Milton St and Morena Boulevard San Diego California, Jane Doe White Female Driver SDMTS 120 Bus Route 1604 about 10:50AM PST on August 21, 2011 Incident at Fashion Valley Transit Station, San Diego California, Paul Pablonski, C. Michael Cowett, Tiffany Lorenzen, Jeff Stumbo, Sharon Cooney, Henri Pruglio, Alan Moldawer, Larry Steffes, Mark L. Joseph, Janet Davis, Christopher Bryan, Donald Saunders, Tom Downs, Valerie Michael and Jan Horstmann collectively named "Veolia cluster personnel" are executives, managers, staff and/or employees of Veolia Environnement, Veolia Transportation Services, Inc., and/or San Diego Metropolitan Transit System aforerecited within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

39. Individual co-defendant and/or defendants' agent Marcus Wang collectively named "Marcus Wang cluster" is a physician engaged in the practice of medicine within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

40. Upon information and belief defendant, individual co-defendants and/or defendants agents aforerecited were at all times relevant hereto and as is applicable either responsible or accountable for or had a duty and/or moral obligation to oversee the day-to-day operation of the applicable companies, businesses, agencies or law offices hereinabove following FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

41. Plaintiff sues all, defendant, co-defendants and/or defendants' agents in their individual capacities.

PROCEDURAL REQUIREMENTS

42. About 2000, plaintiff rented a storage unit on a month to month agreement at the Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

43. From about 2000 to present plaintiff timely, properly, verbally and in writing informed individual co-defendants and/or defendants' agents Public Storage, Inc., 701 Western Ave, Glendale, California 91201, U.S.A, Public Storage, Inc., and Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A. of his continued intention regarding payment of said storage rent and about the nature of the contents of said storage unit and the necessity of their safe-keeping.

44. At no time during the relevant period did plaintiff refuse to pay co-defendants and/or defendants' agents "Public Storage cluster", "Public Storage cluster personnel" their officers, employees, agents or subsidiaries of the applicable rent and any applicable fees or penalties.

45. Individual co-defendants and/or defendants agents "Public Storage cluster" and "Public Storage cluster personnel" of the applicable rent and any applicable fees or penalties collectively named "First cluster set" failed to exhaust their remedies.

46. Plaintiff is not required to exhaust any administrative remedies prior to filing this action.

STATEMENT OF FACTS

47. Plaintiff is and was at all times relevant hereto a resident of Albuquerque, Bernalillo County, New Mexico, U.S.A.

48. About 2000, plaintiff rented a storage unit on a month to month agreement at the Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A.

49. From about January 2000 to present plaintiff timely, properly, verbally and in writing informed co-defendants and/or defendants' agents Public Storage, Inc., 701 Western Ave, Glendale, California 91201, U.S.A, Public Storage, Inc., and Public Storage, Inc., 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A. of his continued intention regarding payment of said storage rent and about the contents of said storage unit and the necessity of their safe-keeping.

50. During said relevant period plaintiff severally, verbally and in writing requested of individual co-defendants and/or defendants' agents "Public Storage cluster" and "Public Storage cluster personnel" of the applicable rent and any applicable fees or penalties that they grant him access to and possession of his property of legal documents including but not limited to immigration documents, investigatory files and diaries, notes, papers, films, pictures, jewelry, business and financial records and objects or articles of evidence stored in his aforesaid storage unit on 3313 Highway 5, Suite F, Douglasville, Georgia

30135, U.S.A. as he needs them for ongoing investigations and litigation but he was repeatedly not granted said access by them without probable cause.

51. At no time during the relevant period did plaintiff refuse to pay co-defendants and/or defendants agents, "Public Storage cluster" and "Public Storage cluster personnel" or any of their subsidiaries, divisions, agents, brands, employees or representatives the applicable rent, fees and/or penalties.

52. About April 2, 2012 plaintiff filed an applicable Complaint For Damages against individual co-defendants and/or defendants' agents aforementioned including but not limited to, "Public Storage cluster", "Public Storage cluster personnel", "U.S District Court cluster personnel", "State of California cluster", "San Diego County cluster", "Broadway cluster", "City Attorney cluster", "City Attorney cluster personnel", "County Counsel cluster", "County Counsel cluster personnel", "San Diego Police cluster", "San Diego Police cluster personnel", "Public Defender cluster", "Public Defender cluster personnel", "Assigned counsel cluster", "Assigned counsel cluster personnel", "Sheriff cluster", "Sheriff cluster personnel", "Port Police cluster", "Port Police cluster personnel", "Highway Patrol cluster", "Highway Patrol cluster personnel", "Forensic Services cluster", "Forensic Services cluster personnel", "Heritage Transit cluster", "Heritage Transit cluster personnel", "Veolia cluster", "Veolia cluster personnel" and "Marcus Wang cluster" in the United States District Court for the Northern District of California as in USDC Case No. CV-12-01879LB and it was subsequently transferred to USDC Northern District of Georgia about May 17, 2012 to USDC Case No. 1:12-CV-01788-AT.

53. About June 25, 2012, the United States District Court for the Northern District of Georgia, Atlanta Division aforementioned dismissed plaintiffs' action and closed said cause, USDC Case No. 1:12-CV-01788-AT.

54. As in tort liability and tort generally plaintiff remains wrongfully denied of his aforerecited property of legal documents and evidence including but not limited to case files, case dockets, immigration documents, investigatory files and diaries, notes, papers, films, pictures, jewelry, business and financial records and objects or articles of evidence stored in his aforementioned storage by individual co-defendants and/or defendants' agents "Atlanta District cluster", "San Francisco District cluster", "Public Storage cluster", "Public Storage cluster personnel" as of today without probable cause in violation of:

i)The Code of Judicial Conduct, the Evidence Code, Evidence Rule, Immigration laws, ABA Model Rule, Rules of Professional Conduct, Rules of Civil and Criminal Procedure, State Bar Act, Constitutional and Statutory provisions to name a few as is or are applicable

55. Individual co-defendants and/or defendants agents "Atlanta District cluster", "San Francisco District cluster", "Public Storage cluster", "Public Storage cluster personnel" or any of their subsidiaries, brands, agents, employees or representatives aforementioned as is applicable failed

to exhaust their remedies and lacked probable cause for denying plaintiff access to and possession of his aforesaid property of legal documents and objects or articles of evidence.

56. As a direct and proximate causation individual co-defendants and/or defendants' agents "Public Storage cluster" and "Public Storage cluster personnel" and any of their subsidiaries, brands, agents, employees or representatives, aforesaid collectively named "First cluster set" acts in tort generally as in aforesaid denial of access to and/or possession of property and evidence continues to adversely affect plaintiff by hindering, obstructing and sabotaging plaintiffs' efforts to timely and properly investigate and/or litigate his severally applicable cases.

57. Additionally, as a contributory effect of the acts in tort generally of individual co-defendants and/or defendants' agents "Atlanta District cluster", "San Francisco District cluster" plaintiff remains wrongfully denied of his aforesaid property of legal documents and evidence including but not limited to case files, case documents, immigration documents, investigatory files and diaries, notes, papers, films, pictures, jewelry, business and financial records and objects or articles of evidence stored in his aforementioned storage unit and that continues to adversely affect plaintiff by hindering, obstructing and sabotaging plaintiffs' efforts to timely and properly investigate and/or litigate his severally applicable cases in violation of:

i) ABA Model Rule, Rules of Professional Conduct generally, Evidence Code, Evidence Rule, International Immigration Laws including the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Code of Judicial Conduct, Rules of Civil and Criminal Procedure, Local Rules, State Bar Act, Constitutional and Statutory provisions to name a few as is or are applicable as a result of their aforesaid acts in tort generally.

58. As in tort liability and tort generally and similarly lacking probable cause individual co-defendants and/or defendants' agents "U.S. District Court cluster personnel", "State of California cluster", "San Diego County cluster", "Broadway cluster", "City Attorney cluster", "City Attorney cluster personnel", "County Counsel cluster", "County Counsel cluster personnel", "San Diego Police cluster", "San Diego Police cluster personnel", "City cluster personnel", "Public Defender cluster", "Public Defender cluster personnel", "Assigned counsel cluster", "Assigned counsel cluster personnel", "Sheriff cluster", "Sheriff cluster personnel", "Port Police cluster", "Port Police cluster personnel", "Highway Patrol cluster", "Highway Patrol cluster personnel", "Forensic Services cluster", "Forensic Services cluster personnel", "Heritage Transit cluster", "Heritage Transit cluster personnel", "Veolia cluster", "Veolia cluster personnel" and "Marcus Wang cluster" collectively injured plaintiff severally including but not limited to malicious falsehood, loss of enjoyment of life, loss of consortium, libel, defamation, slander, damage to property, obstruction of justice, theft of property, fraud, loss of credit privileges, attempted murder, assault and battery, judicial misconduct, attorney misconduct, denial of proper medical care to name a few in violation of:

i)The Code of Judicial Conduct, the Evidence Code, Evidence Rule, International Immigration Laws including the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Conduct, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Conduct generally, ABA Model Rule, Rules of Professional Conduct generally, Rules of Civil and Criminal Procedure generally, State Bar Act, Local Rules, The Medical Board of California Business and Professions Code, Constitutional and Statutory provisions to name a few as is or are applicable.

59. Individual co-defendant and/or defendants' agents "Atlanta District cluster", "San Francisco District cluster" and "U.S. District Court cluster personnel" aforerecited lacked due diligence, proper case knowledge and failed to take proper judicial notice as pertains to said cause and that principally constitutes the gravamen of the irresponsible, injurious, frivolous, reckless and prejudiced findings, recommendations, order and judgment by them in USDC San Diego Case No. 11-CV-1906-JAH(WVG), USDC San Diego Case No. 3-11-CV-1808-JAH (BLM), The Superior Court of California San Diego County Case No. M 098172, USDC Case No. C 12-01879LB and USDC Case No. 1:12-CV-01788-AT as is or are applicable.

60. As in tort and similarly lacking probable cause individual co-defendants and/or defendants' agents "U.S. District Court cluster personnel", "State of California cluster", "San Diego County cluster", "Broadway cluster", "City Attorney cluster", "City Attorney cluster personnel", "County Counsel cluster", "County Counsel cluster personnel", "City cluster personnel", "San Diego Police cluster", "San Diego Police cluster personnel", "Public Defender cluster", "Public Defender cluster personnel", "Assigned counsel cluster", "Assigned counsel cluster personnel", "Sheriff cluster", "Sheriff cluster personnel", "Port Police cluster", "Port Police cluster personnel", "Highway Patrol cluster", "Highway Patrol cluster personnel", "Forensic Services cluster", "Forensic Services cluster personnel", "Heritage Transit cluster", "Heritage Transit cluster personnel", "Veolia cluster", "Veolia cluster personnel" and "Marcus Wang cluster" collectively named "Second cluster set" injured plaintiff severally including but not limited to malicious falsehood, loss of enjoyment of life, loss of income, loss of consortium, defamation, slander, obstruction of justice, fraud, theft, damage to property, loss of credit privileges, attempted murder, assault and battery, judicial misconduct, attorney misconduct, denial of proper medical care to name a few as is or are applicable in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Code of Judicial Conduct, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local Rules, California Standards of Judicial Administration to name a few as is or are applicable.

CLAIM (COUNT) 1 NEGLIGENCE

61. Plaintiff incorporates herein by reference all the foregoing paragraphs 1 through 60 as though the same were fully set forth herein.

62. Defendant, United States of America as party and as is liable for its acts and the acts of its individual co-defendants and/or agents aforerecited following FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

63. Individual co-defendants and/or defendants' agents "First cluster set" and "Second cluster set" malicious acts, lacking probable cause and as in tort negligence denied plaintiff timely access to and possession of his property of legal documents and evidence including but not limited to immigration documents, investigatory files and diaries, notes, papers, films, pictures, jewelry, business and personal records and objects or articles of evidence stored in his aforesaid storage unit at the Public Storage, Inc., on 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A. which he urgently needed and continues to need for current, ongoing investigations and litigation in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, Code of Judicial Conduct, the Medical Board of California Business and Professions Code, Board of Pharmacy Rules and Regulations, Rules of Professional Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local Rules, California Standards of Judicial Administration to name a few as is or are applicable within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

64. Individual co-defendants and/or defendants' agents "First cluster set" and "Second cluster set" malicious acts, lacking probable cause, as in tort negligence lacked due diligence and were negligent of their duty and/or moral obligation to protect plaintiffs' rights under the law in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Code of Judicial Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local

Rules, California Standards of Judicial Administration to name a few as is applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

65. Individual co-defendants and/or defendants' agents "First cluster set" and "Second cluster set" hereinabove had ample opportunity to interceded on behalf of the plaintiff but refused to do so thus intentionally subjecting plaintiff to unlawful and wrongful acts as in tort negligence herein recited in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, Code of Judicial Conduct, the Medical Board of California Business and Professions Code, California Rules of Professional Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local Rules, California Standards of Judicial Administration to name a few as is applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

66. As a cause-in-effect of the tort negligence by individual co-defendants and/or defendants' agents "First cluster set" and "Second cluster set" aforerecited plaintiff was deprived as in tort generally of his right to timely possession and use of his property of legal documents, immigration documents and objects or articles of evidence as aforescribed in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, the Medical Board of California Business and Professions Code, California Rules of Professional Conduct, Constitutional and Statutory provisions, Code of Judicial Conduct, Rules of Criminal and Civil Procedure, Local Rules, California Standards of Judicial Administration to name a few as is applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

67. As a direct and proximate causation of the tort negligence by individual co-defendants and/or defendants agents aforerecited plaintiff was deprived of a speedy litigation of his cases in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria

immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Constitutional and Statutory provisions, Code of Judicial Conduct, Rules of Criminal and Civil Procedure, Local Rules, Standards of Judicial Administration to name a few as is applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

68. Individual co-defendants and/or defendants' agents aforerecited did not have probable cause for said tort negligence.

69. Resultant of the aforerecited acts in tort by "First cluster set" and "Second cluster set" individual co-defendants and/or defendants' agents as is applicable plaintiff was damaged in the amount to be established at trial for which he is entitled to just and fair compensation.

WHEREFORE, as relief, plaintiff respectfully requests that the court find in favor of plaintiff and against individual co-defendants and/or defendants' agents as follows.

i. Order individual co-defendants and/or defendants' agents to make plaintiff whole by providing appropriate back pay with pre-judgment interest, front pay with post-judgment interest and other affirmative relief necessary to eradicate the effects of aforerecited tort negligence.

ii. Order individual co-defendants and/or defendants' agents to make plaintiff whole by providing compensation for past and future pecuniary losses resulting from said acts in tort.

iii. Order defendant, individual co-defendants and/or defendants' agents aforesaid to make plaintiff whole by providing past and future non-pecuniary losses resulting from such acts in tort including but not limited to intentional infliction of emotional distress, mental anguish, pain and suffering, humiliation, loss of reasonable time, loss of enjoyment of life, loss of consortium to name a few in the amounts to be determined at trial.

iv. Order individual co-defendants and/or defendants' agents to make plaintiff whole by granting plaintiff access to and possession of all his said property of legal documents and evidence including immigration documents and objects or articles of evidence aforerecited in said storage unit at the Public Storage, Inc., on 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A in accordance with:

i) The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, Code of Judicial Conduct, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, State Bar Act, Rules of Professional Conduct, Constitutional Amendments and Statutory provisions,

Rules of Criminal and Civil Procedure, Local Rules, Standards of Judicial Administration to name a few as is or are applicable.

v. Award plaintiff reasonable legal fees, investigatory fees, attorney's fees, compensatory damages as aforesaid, exemplary damages and costs of this action as is or are applicable.

vi. Such other and further relief as the court deems just and proper in the premise.

CLAIM (COUNT) II CONSPIRACY

70. As for his second cause of action or claim against individual co-defendants and/or defendants' agents plaintiff incorporates herein by reference all the foregoing paragraphs 1 through 69 as though the same were fully set forth herein.

71. Defendant, United States of America as party and as is liable for its acts and the acts of its individual co-defendants and/or agents aforesaid within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

72. As in tort conspiracy "First cluster set" individual co-defendants and/or defendants as are applicable conspired together and reached a mutual understanding and acting in concert undertook a course of conduct tortuous to plaintiff as hereinabove and in violation of the:

i) Evidence Code, the Evidence Rule, international immigration laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Constitutional and Statutory provisions to name a few as is applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

73. Sounding in tort conspiracy, "Second cluster set" individual co-defendants and/or defendants as is or are applicable conspired together and reached a mutual understanding and acting in concert undertook a course of conduct tortuous to plaintiff as hereinabove in violation of:

i) The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, Local Rules, State Bar Act, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local Rules, Standards of Judicial Administration to name a few as is or are applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

74. "First cluster set" and "Second cluster set" individual co-defendants and/or defendants' agents as is or are applicable agreed to target plaintiff failing to investigate thoroughly and without prejudice the evidence or lack thereof against plaintiff and agreeing to intentionally and maliciously act in tort as hereinabove within meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

75. "First cluster set" and "Second cluster set" individual co-defendants and/or defendants' agents as is or are applicable lacking probable cause agreed to intentionally fabricate evidence, overlook exculpatory evidence and cause plaintiff to be harassed, intimidated, embarrassed, denied access to his property of legal documents and objects of evidence, loose gainful employment and income, loose credit privileges, speedy litigation and investigations to name a few in violation of:

i)The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, Local Rules, State Bar Act, Board of Pharmacy Rules and Regulations, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Constitutional and Statutory provisions, Code of Judicial Conduct , Rules of Criminal and Civil Procedure, Local Rules, Standards of Judicial Administration to name a few as is or are applicable confounded in FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

76. Individual co-defendants and/or defendants' agents aforerecited did not have probable cause for said tort conspiracy.

77. As a direct and proximate causation of the foregoing tort conspiracy by "First cluster set" and "Second cluster set" individual co-defendants and/or defendants' agents as is/are applicable plaintiff was damaged in the amount to be established at trial for which he is entitled to just and fair compensation.

CLAIM(COUNT) III INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

78. As for his third cause of action or claim against individual co-defendants and/or defendants' agents plaintiff incorporates by reference all the foregoing paragraphs 1 through 77 as though the same were fully set forth herein.

79. Defendant, United States of America as party and as is liable for its acts and the acts of its individual co-defendants and/or agents aforerecited and within the meaning of FTCA 28 U.S.C Sections 1346, 1402, 2401, 2402, 2422, 2671 et seq.

80. Defendant, “First cluster set” and “Second cluster set” individual co-defendants and/or defendants’ agents actionable acts in tort aforementioned lacking probable cause and violative of:

i) The Evidence Code, the Evidence Rule, International Immigration Laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, ABA Model Rule, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Local Rules, Code of Judicial Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local Rules, Standards of Judicial Administration to name a few as is or are applicable were so extreme and outrageous as to go beyond decency and to be regarded as irresponsible, reckless, blatant, abusive, atrocious, capricious, dehumanizing, intolerable, emotionally distressing and mentally anguishing to say the least.

81. The extreme and outrageous acts by Defendant, “First cluster set” and “Second cluster set” individual co-defendants and/or defendants’ agents sounding in tort as aforesaid include but not limited to.

i. Deliberate, intentional and continued refusal to timely allow plaintiff possession of his property of legal documents and objects or articles of evidence in aforesaid storage unit despite plaintiffs’ repeated timely, proper, verbal and written requests that they do so.

ii. Deliberate, intentional and continued attempts by “First cluster set” and “Second cluster set” individual co-defendants and/or defendants’ agents, which lacked probable cause, to sabotage plaintiffs’ efforts to gain possession of his property of legal documents and objects or articles of evidence aforesaid.

iii. Deliberate, intentional and continued attempts by “First cluster set” and “Second cluster set” individual co-defendants and/or defendants’ agents to violate the Evidence Code, the Evidence Rule, International Immigration laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, Law Enforcement Code of Ethics, American Medical Association Code of Ethics, Code of Judicial Ethics, State Bar Act, ABA Model Rule, the Medical Board of California Business and Professions Code, Rules of Professional Conduct, Constitutional and Statutory provisions, Rules of Criminal and Civil Procedure, Local Rules, Standards of Judicial Administration to name a few and to sabotage plaintiffs’ efforts for a speedy trial of his litigation and to adversely affect his applicable several investigations and responsibilities.

iv. Deliberate, intentional and continued acts in tort liability and tort generally by “First cluster set” and “Second cluster set” individual co-defendants and/or defendants’ agents as

hereinabove as in judicial misconduct, evidence tampering, assault and battery, perjury, attempted murder, obstruction of justice, fraud, theft of property, vandalism, defamation, slander, retaliation, denial of due process which injured and continues to injure plaintiff severally by causing him malicious falsehood, loss of credit privileges, loss of reasonable time, loss of enjoyment of life, loss of income as in malicious falsehood and loss of consortium to name a few.

82. Resultant of Defendants', "First cluster set" and "Second cluster set" individual co-defendants and/or defendants' agents actionable acts in tort aforerecited plaintiff suffered and continues to suffer emotional distress, mental anguish, pain and suffering.

WHEREFORE as relief, plaintiff requests that the court.

i. Award him damages including pre-judgment interest to compensate him fully for all injuries caused him by defendant, individual co-defendants and/or defendants' agents acts in tort aforerecited including but not limited to back pay, front pay, pain and suffering, intentional infliction of emotional distress and mental anguish in an amount to be determined at trial.

ii. Award him legal fees, attorney's fees, investigatory fees, compensatory damages as aforerecited, exemplary damages and costs of this action as is/are applicable.

iii. Order individual co-defendants and/or defendants agents to make plaintiff whole by granting plaintiff possession of all his said property of legal documents, investigatory files and diaries, case files, case dockets, diplomas, immigration documents and objects or articles of evidence in said storage unit on 3313 Highway 5, Suite F, Douglasville, Georgia 30135, U.S.A in accordance with:

i) The Evidence Code, Evidence Rule and International Immigration laws including but not limited to the United States of America and the Federal Republic of Nigeria immigration laws, passport and other immigration documents rules, constitutional and statutory provisions to name a few as is applicable.

iv. Such other and further relief as the court deems just and proper in the premise.

83. Individual co-defendants and/or defendants' agents failed to exercise due diligence, their responsibility and/or moral obligation to protect plaintiffs' rights, constitutional and statutory privileges and were engaged in and/or aided and abetted, fraudulent, inherently and patently irresponsible, discriminatory, frivolous, reckless, abusive and malicious acts as aforescribed.

84. The totality of the circumstances in said malicious acts in tort liability and tort generally by defendants', individual co-defendants' and/or defendant agents hereinabove caused plaintiff to suffer intentional emotional distress, mental anguish, loss of enjoyment of life, loss of income, loss of consortium, pain and suffering to name a few.

85. Plaintiff hereby requests that the court grant him permission as is necessary to amend his complaint in afore-styled cause following discovery as applicable relevant information become available to him as severally crucial applicable evidence are currently converted by the United States Postal Service, Airport Facility, Albuquerque, New Mexico and Carrollton, Georgia, Franklin Resources, Inc., San Mateo, California and subsidiaries and Franklin Capital Corporation, Salt Lake City, Utah, Bernalillo County Sheriffs' Office, Albuquerque, New Mexico, American Recovery, Albuquerque, New Mexico, Madrid Towing, Albuquerque, New Mexico, FedEx Corporation, Memphis, Tennessee, Law Offices of Gallo and Associates, Los Angeles, California and other locations, AMERCO, Reno, Nevada and U-Haul International, Inc., Phoenix, Arizona, San Diego Police Department, San Diego, California, San Diego Harbor Police Department, San Diego, California, Heritage Security Services, San Diego, California, Fort Heritage Courier Service, San Diego, California, Transit System Security, San Diego, California, C and D Towing Specialists, Inc./McBride, San Diego and La Mesa, California and other locations, Talon Auto Adjusters, La Mesa, California and other locations, Adesa LA Auctioneers, Mira Loma, California, Adesa Corporation, LLC, Mira Loma, California and other locations, Toyota Financial Services Corporation, Torrance, California, Toyota Motor Company U.S.A, Larry Miller American Toyota, Albuquerque, New Mexico, Larry Miller Group of Companies, Salt Lake City, Utah, Public Storage, Glendale, California and Douglasville, Georgia and other locations, Shurgard Storage Centers, Shurgard Self Storage, Duluth, Georgia, Seattle, Washington and other locations, AMERCO, Reno, Nevada and U-Haul International, Inc., Phoenix, Arizona, U-Haul Self Storage Centers, Albuquerque, New Mexico and other locations, Leroy Frank Auctioneers, Phoenix, Arizona, Price Self Storage, LLC. and Price Self Storage Management, Inc., San Diego, California and other locations, Watson and Taylor Management, Inc., Addison, Texas, El Paso, Texas and other locations/Kennedy-Wilson, Inc., /Behringer Harvard Holdings, LLC., SafeLock Self Storage, South Beach, Oregon and other locations, Valero Energy Corporation/Diamond Shamrock, San Antonio, Texas, Albuquerque, New Mexico and other locations, the United States Postal Service, Airport Facility, Albuquerque, New Mexico and Carrollton, Georgia, Law Offices of Bobby Aniekwu and Associates, Atlanta, GA, McIntyre Law, P.C, Oklahoma City, Oklahoma, other self-storage companies and businesses nationwide. USDC San Diego Case No. 11-CV-1906-JAH(WVG), USDC San Diego Case No. 3-11-CV-1808-JAH (BLM), Superior Court of California San Diego County Case No. M098172, Superior Court of California San Diego County Case No.Z358388, Superior Court of California San Diego County Case No. Z372759, Superior Court of California San Diego County Case No. Z321660/Multiple.

WHEREFORE, plaintiff prays that this court accept his complaint, order the matter scheduled for pre-trial discovery and thereafter order the matter scheduled for trial on the merits. Plaintiff prays for trial by jury on all issues so triable. Plaintiff further prays that after trial on the merits, the court award plaintiff exemplary damages, compensatory damages, costs of this action and attorneys' fees in the appropriate amounts.

Plaintiff further prays that the court grant him such other and further relief as may be just and necessary in the premise.

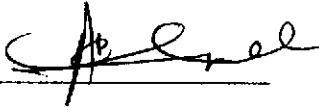
Respectfully submitted,



Chibueze C. Anaeme
Plaintiff pro se
c/o General Delivery
United States Post Office-Midway Branch
San Diego, California 92138, U.S.A.
Email:nexnns@yahoo.com
Phone: (212)808-0302 (Temporary)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing COMPLAINT FOR DAMAGES was mailed to Defendant and/or co-defendants or their counsel of record or registered agents' last known address by U.S First class mail on _____, 2012.



Chibueze C. Anaeme

Plaintiff in pro se